

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: COMPUTE NORTH HOLDINGS, INC., <i>et al.</i>,¹ Debtors.	§ § § § § § §	Chapter 11 (Jointly Administered) Case No. 22-90273 (MI) Hearing Date and Time: December 20, 2022 at 2:00 p.m.
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**CORPUS CHRISTI ENERGY PARK, LLC's
WITNESS AND EXHIBIT LIST FOR DECEMBER 20, 2022 HEARING**

[Relates to Dkt. Nos. 644 and 645]

Corpus Christi Energy Park, LLC ("CCEP") files this Witness and Exhibit List for the hearing scheduled for **Tuesday, December 20, 2022 at 2:00 p.m. Central Time**, on the *Emergency Motion to Compel Rejection by Debtor CN Corpus Christi, LLC of Design-Build Contract* (Dkt. No. 644) ("Rejection Motion") and the *Emergency Motion for Relief from Automatic Stay and for Waiver of 14-Day Stay on Order Granting Relief* (Dkt. No. 645) ("Lift Stay Motion") filed by CCEP, (or as such hearing may be continued or rescheduled, the "Hearing").

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors' service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

WITNESSES

CCEP may examine:

1. Steve Quisenberry;
2. Matthew Held; and
3. Any witness necessary to rebut testimony of a witness called or designated by the Debtors or any other party.

EXHIBITS

CCEP may offer into evidence any one or more of the following exhibits at the Hearing:

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Design Build Contract ² --Ex. 1-A: Agreed Change Order (5/10/22) --Ex. 1-B: Proposed Change Order (9/22/22)				
2	Declaration of Steve Quisenberry				
3	Movant's Proposed Order on Rejection Motion				
4	Movant's Proposed Order on Lift Stay Motion				

CCEP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing and to present rebuttal witnesses and exhibits.

² The DB Contract and attached Change Orders are potentially subject to a non-disclosure agreement between the parties. Absent Debtors' approval for the DB Contract's publication, Movant will make a copy available to the Court for *in camera* review.

Dated: December 19, 2022.

Respectfully submitted,

By: /s/ Robert C. Rowe

Mark A. Castillo

Texas State Bar No. 24027795

Southern Dist. Admin. No. 31520

Robert C. Rowe

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***Bankruptcy Counsel for
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CERTIFICATE OF SERVICE

The undersigned certifies that, pursuant to Fed. R. Bankr. P. 4001 and LBR 4001-1(a)(4), on December 19, 2022, a true and correct copy of this document was properly served upon the following parties and/or their counsel of record: the Debtors, Official Committee of Unsecured Creditors, parties requesting notice, parties with an interest in collateral that is the subject of the requested relief, co-debtors under 11 U.S.C. § 1301, parties who are identified as a party against whom relief is sought in the motion, and the U.S. Trustee.

Certified on December 19, 2022.

/s/ Robert C. Rowe

Robert C. Rowe